

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

ANGELA SALAZAR o/b/o J.M.,
a minor child,

Plaintiff,

v.

Case No.

1:21-CV-00751-KK-JHR

RIO RANCHO PUBLIC SCHOOLS
BOARD OF EDUCATION, GEORGE
ARCHULETA in his individual
capacity, and JOHN DOE #1
in his individual capacity,

Defendants.

_____/

ZOOM DEPOSITION OF JOSEPH MARTINEZ SALAZAR

Friday, July 29, 2022

Albuquerque, New Mexico

PURSUANT TO THE NEW MEXICO RULES OF CIVIL
PROCEDURE, this deposition was:

TAKEN BY: JERRY A. WALZ, ESQ.
ATTORNEY FOR THE DEFENDANTS

REPORTED BY: TERI WARD, RPR, CCR #549
PAUL BACA COURT REPORTERS
500 4th Street, Suite 105
Albuquerque, New Mexico 87102

EXHIBIT K

Page 1

<p>1 Ms. Cordova to see if she was prepared to go forward 2 with her deposition, given the representations from 3 Mr. Mondragon, so as to not tie up the time of 4 attorneys and Elsie Cordova if she was unable to go 5 forward. 6 Mr. Bullion appropriately and promptly 7 informed counsel that Ms. Cordova was not able, for 8 reasons stated, to go forward with her deposition, 9 and therefore, we're reserving her deposition and 10 all issues associated with her deposition at a later 11 time. 12 I think I've captured what our agreement 13 was as to Ms. Cordova. Am I correct in that regard? 14 If we could go around the horn, please. 15 Mr. Quinones, is that what your understanding was? 16 MR. QUINONES: Yes, that's my 17 understanding, Counsel. 18 MR. WALZ: Mr. Bullion? 19 MR. BULLION: Yes, Mr. Walz. That was a 20 accurate recitation of the events yesterday, and I 21 agree. 22 MR. WALZ: Thank you so much. 23 Okay. Madam Court Reporter, now we're 24 ready to formally start the deposition here. 25 JOSEPH MARTINEZ SALAZAR,</p> <p style="text-align: right;">Page 6</p>	<p>1 Q. Okay. I would like you to know who 2 everybody is, obviously. I know you know who 3 Mr. Bullion is, but I'm going to ask counsel to 4 state for the record their appearances. 5 I'm Jerry Walz. I represent the Rio 6 Rancho Public Schools and Board of Education in this 7 lawsuit. 8 MR. QUINONES: Carlos Quinones. I 9 represent Defendant George Archuleta. 10 MR. BULLION: And this is Todd Bullion 11 representing the plaintiff. 12 MR. WALZ: Okay. Thank you, Counsel. 13 BY MR. WALZ: 14 Q. Let me ask you this, Mr. Salazar, what 15 did you do to prepare, if anything, for your 16 deposition today? 17 A. What would I call it? The forms? 18 Q. And let me just ask you real quick. 19 You're looking at somebody. If it's Mr. Bullion, 20 that's fine, but is there anybody else in the room 21 with you? 22 MR. BULLION: Joseph's mother, Angela, 23 is in the room. Per our agreement, she's sitting in 24 on the deposition today. 25 MR. WALZ: And that's fine. I have no</p> <p style="text-align: right;">Page 8</p>
<p>1 having been called as a witness and having been 2 first duly sworn, was examined and testified as 3 follows: 4 MR. WALZ: Okay. And are we recording 5 this video-wise, too? 6 THE COURT REPORTER: It wasn't -- just 7 as a back-up, if that makes sense. 8 MR. WALZ: Yes, it does, but we would 9 ask that you record it as a back-up, put the video 10 on. Okay? 11 THE COURT REPORTER: Okay. 12 MR. WALZ: Because Mr. Baca in the past 13 has accommodated counsel by giving us the video as 14 well. 15 THE COURT REPORTER: Okay. 16 MR. WALZ: All righty. Thank you. 17 EXAMINATION 18 BY MR. WALZ: 19 Q. All right. So let me have you state 20 your name, Joseph. Would you give us your full 21 legal name and your date of birth. 22 A. Joseph Michael Salazar. My date of 23 birth is April 2nd of 2004. 24 Q. So are you 18 now? 25 A. I am.</p> <p style="text-align: right;">Page 7</p>	<p>1 problem with that. 2 BY MR. WALZ: 3 Q. So let me define this a little bit more 4 for you, if I could, please. This is your 5 deposition, your testimony. What you discuss with 6 Mr. Bullion is covered by attorney-client privilege. 7 If you talked to him before, I don't want to know 8 and please don't tell me what you've spoken to him 9 about. 10 Regarding conversations with your 11 mother, she's also listed as a witness, and I'm 12 going to have to ask you questions about various 13 interactions with your mother -- I'm giving you a 14 little blueprint here that might be helpful -- 15 interactions that you had with Daniel Mondragon, 16 maybe his father, Mark Mondragon, maybe interactions 17 that you had with Laius Martinez and others that 18 have been either identified through deposition 19 testimony or listed as witnesses. 20 Do you understand that? 21 A. I do. 22 Q. All right. And you're doing a great job 23 so far and let's keep it up where you let me finish 24 my question and I'll quit talking, let you talk, and 25 then after you're done talking, then I might</p> <p style="text-align: right;">Page 9</p>

<p>1 Q. Okay. So let's -- we'll break these 2 down one at a time. Mr. Baca, you never made a 3 complaint about, right?</p> <p>4 A. No.</p> <p>5 Q. So then you said you went to the main 6 principal. Was that Mr. Affentranger?</p> <p>7 A. Yes.</p> <p>8 Q. What did you exactly tell him about any 9 inappropriate touching or conduct by Mr. Archuleta?</p> <p>10 A. I believe it was -- it was after the 11 second incident I had went into his office 12 specifically to talk to him about the situation, and 13 I was -- as I was telling him the details, he was -- 14 he was acting as if he had something better to do or 15 you know what I mean, this wasn't a situation that 16 he had to deal with. He kind of just, I mean, like 17 whatever, like shrugged if off like do you need 18 anything else kind of.</p> <p>19 Q. Okay. Now -- and I appreciate you 20 describing how you believe Mr. Affentranger was 21 responding, but did you ever tell him specifically 22 that George Archuleta, in your opinion, touched you 23 in a sexually inappropriate manner?</p> <p>24 A. Yes.</p> <p>25 Q. What did you say exactly?</p> <p style="text-align: right;">Page 94</p>	<p>1 my -- my left -- my left testicle had been touched, 2 and I told Mr. Affentranger how I felt about it, and 3 he didn't care. He kind of told me that 4 essentially, he doesn't have to deal with it. He 5 has, you know, bigger stuff to deal with.</p> <p>6 Q. How long did this conversation take 7 place?</p> <p>8 A. Maybe ten minutes max.</p> <p>9 Q. Were there any other individuals there?</p> <p>10 A. No.</p> <p>11 Q. Okay. Well, we're going to come back to 12 that. Was there any other administrator that you 13 went in to speak with where you complained of 14 Mr. Archuleta's conduct?</p> <p>15 A. No.</p> <p>16 Q. Do you know more or less the date when 17 you met with Mr. Affentranger?</p> <p>18 A. I do not recall.</p> <p>19 Q. Do you know what year you were in high 20 school when this conversation you had or claim you 21 had with Mr. Affentranger?</p> <p>22 A. I believe I was in my sophomore year.</p> <p>23 Q. And Mr. Quinones is going to ask you I'm 24 sure specific of the search, I'm just trying to get 25 kind of an overview of the situation. All right.</p> <p style="text-align: right;">Page 96</p>
<p>1 A. I had -- I had expressed to him that in 2 the last time that I had been searched, I believe 3 that there was -- there was some really weird and 4 off-putting things that had went on between, you 5 know, the search and after, so I had told him that 6 -- I had told him essentially what happened in that 7 room, and he kind of just, you know, was like 8 whatever.</p> <p>9 Q. What did you tell him, though? You said 10 you essentially told him. What did you tell him?</p> <p>11 A. Yes, I told him that when I was pulled 12 into the security room for searching, that I believe 13 there was something that went on that is with -- 14 outside the guidelines of how a security guard is 15 supposed to perform a search, I guess you could say.</p> <p>16 And I had expressed to him that when I 17 was getting patted down on my legs for, 18 quote/unquote, contraband that George was -- he was 19 getting -- he was getting really high on the thigh 20 area. And as I'm facing the wall, because I've been 21 through this so many times, I'm just -- you know, 22 I'm kind of like get it over with already.</p> <p>23 As I'm facing the wall, I'm kind of 24 like, -- almost like when I heard that sound, I'm 25 kind of in shock, and then my brain registered that</p> <p style="text-align: right;">Page 95</p>	<p>1 So let's go back in time and then we're 2 going to come back up in time again. We're talking 3 about middle school, and what got us on this topic, 4 I asked you if you had any complaints about any 5 searches or seizures that occurred at mid school, 6 that would be Mountain View.</p> <p>7 A. Yes.</p> <p>8 Q. And I have not heard you say that you 9 had any complaints from -- from middle school; is 10 that right?</p> <p>11 A. That's correct.</p> <p>12 Q. Okay. Okay. After you graduate from 13 mid school, did you work the summer between mid 14 school and high school?</p> <p>15 A. No.</p> <p>16 Q. What did you do that summer?</p> <p>17 A. I couldn't tell you. It's been so many 18 years.</p> <p>19 Q. Well, what year did you start high 20 school?</p> <p>21 A. I believe it was 2018 or '19.</p> <p>22 Q. Okay. And so here we're still in 2022, 23 but you can't recall what you did between the -- 24 during the summer between mid school and high 25 school?</p> <p style="text-align: right;">Page 97</p>

<p>1 other aides was -- I believe one of their name was 2 Scott, and the other I don't recall his name. 3 Q. You said that they would mediate at the 4 main office. What do you mean by that? Mediate 5 with who? 6 A. I guess you could say the principal or 7 whoever I was talking to. 8 Q. Well, that went into my other kind of 9 question, does this involve disciplinary issues as 10 well, this program? 11 A. Yes. 12 Q. Okay. Did your mother know that you 13 were a part of that program? 14 A. Yes. 15 Q. Okay. So I heard you say that one guy 16 was the head coach. The head coach of what? What 17 sport? 18 A. Of Storm. 19 Q. Oh, okay. You're not talking like a 20 sports coach, right? 21 A. He was both. He was the head coach of 22 the Storm program, and he -- he also coached some 23 other things throughout the school. 24 Q. And do you know his name? 25 A. Off the top of my head right now, no.</p> <p style="text-align: right;">Page 122</p>	<p>1 A. It was relatively -- 2 Q. I'm sorry? 3 A. It was relatively every time they tried 4 to search me, which was every day. So I would 5 assume over 40 or 50 or something like that. 6 Q. How many times were you actually 7 searched, to the best of your recollection, your 8 sophomore year? 9 A. More than 50 times, for sure. 10 Q. And where did these searches take place? 11 A. Mainly in the office or the security 12 office, but sometimes it would vary. 13 Q. Can you give me the name of one witness 14 that you have that can verify or validate your claim 15 that you were searched more than 50 times your 16 sophomore year? 17 A. I think -- I think Daniel would -- would 18 I guess you could say be a person that could give a 19 number or something like that or I don't necessarily 20 think Laius, but maybe Daniel. 21 Q. Okay. Now, was Daniel present whenever 22 these searches occurred? 23 A. Once in a while, but -- 24 Q. Okay. If possible -- and you know 25 Daniel has a lawsuit, too, the three of you, right?</p> <p style="text-align: right;">Page 124</p>
<p>1 Q. So just being clear, I asked you for the 2 names of any of the aides. You said you had about 3 maybe five of them during the year; is that right? 4 A. Yes. There was around five of them. 5 Three male and two female. 6 Q. And I've asked you for names, and 7 actually names you've not been able to give me any; 8 is that right? 9 A. Yes. 10 Q. Is there a reason that you cannot recall 11 these people that -- that were with you as aides at 12 school? 13 A. I mean, it's been a very long time. I 14 don't -- I don't see why anyone would particularly 15 try to remember something of that nature. 16 Q. Well, wasn't this just in 2019? 17 A. Whatever year I got put into Storm. 18 Q. Okay. So as we're here today, you can't 19 remember any of the names? 20 A. No. 21 Q. All right. And how many times do you 22 think you were -- if you can project and remember 23 the best you can, how many times do you think that 24 you were either -- you were written up for any type 25 of disciplinary offense during your sophomore year?</p> <p style="text-align: right;">Page 123</p>	<p>1 A. Yes. 2 Q. You're the only three that have any 3 lawsuit where there's a claim of improper search and 4 seizure. 5 Do you understand that? 6 MR. BULLION: Form. 7 THE WITNESS: Yes. 8 BY MR. WALZ: 9 Q. Right? And you understand that all 10 three of you were friends during high school? 11 MR. BULLION: Form. 12 THE WITNESS: I understand that. 13 BY MR. WALZ: 14 Q. Okay. I'm looking for maybe some 15 independent witness that doesn't -- or it can be a 16 friend, but do you have like -- I think I asked you 17 this in your interrogatories, too, by the way. I 18 don't think you named anybody that can say, look, I 19 was in this class with Joseph and I witnessed 10 20 times -- I'm just using that number, okay -- 10 21 times I witnessed him being searched in the hallway 22 or do you have anybody like that that you can 23 identify? 24 MR. BULLION: Form. 25 THE WITNESS: The only person that I</p> <p style="text-align: right;">Page 125</p>

<p>1 could think of is the head coach, and now that I'm 2 thinking about it, I recall his -- we would call him 3 Mr. Young or something like that. 4 BY MR. WALZ: 5 Q. Okay. 6 A. Coach Young. 7 Q. And how many times do you think he was 8 present when you were searched? 9 A. Maybe ten, if that. 10 Q. Okay. And we'll try to locate him. Do 11 you know if he's still with the school district? 12 A. I'm not sure. 13 Q. Okay. And other than him, Daniel 14 actually was never present with you when you were 15 searched ever, was he? 16 A. No. 17 Q. Okay. If Daniel has a number or some 18 information that's because that would have been 19 information you would have told him, right? 20 A. No. 21 MR. BULLION: Form. 22 BY MR. WALZ: 23 Q. What do you mean no? How would Daniel 24 know -- 25 A. It's something he would have gained from</p> <p style="text-align: right;">Page 126</p>	<p>1 Q. And when this happened, was there any 2 witness present at the time? 3 A. No. 4 Q. So it's just your word that you claimed 5 that you were searched twice inappropriately by 6 George Archuleta? 7 MR. BULLION: Form. 8 THE WITNESS: Correct. 9 BY MR. WALZ: 10 Q. And did both those searches occur in 11 your sophomore year? 12 A. Yes. 13 Q. Nothing happened your junior year? 14 A. Not that I can recall. 15 Q. Or senior year? 16 A. Not that I can recall. 17 Q. Now, was one of the disciplinary 18 infractions, Joseph, your sophomore year, we talked 19 a little bit about it before was for the body 20 punching that you and Daniel were engaged in? 21 A. Yes. 22 Q. I'm looking at a report or statement 23 assigned 2/21/19. So that's February 21, 2019. And 24 I'll read it to you verbatim. It's very short by 25 Daniel Mondragon.</p> <p style="text-align: right;">Page 128</p>
<p>1 himself. We had talked about us being searched and 2 -- 3 Q. Okay. 4 A. -- you know, it was a normal thing. It 5 was quite weird, honestly. 6 Q. Okay. Did you report these searches 7 some 40 to 50 searches during your sophomore year to 8 your mother? 9 A. Yes. 10 Q. Now, when you told her about these 11 searches, we talked about this before, the only 12 search or searches that you claimed were 13 inappropriate touching was with George Archuleta, 14 right? 15 A. Correct. 16 Q. And how many times did that occur? Was 17 it like -- well, I don't want to put words in your 18 mouth. How many times do you think Mr. Archuleta 19 touched you in an inappropriate manner during a 20 search? 21 A. I'd say about twice. 22 Q. Okay. Two times? 23 A. Correct. 24 Q. Okay. That's it? 25 A. Correct.</p> <p style="text-align: right;">Page 127</p>	<p>1 Voluntary statement: Me and Joe were 2 just throwing hands in the bathroom and both of us 3 hit each other in the face. 4 Do you think that that's a correct 5 statement? 6 A. I'd say that's yes, somewhat accurate. 7 Q. I'm sorry? 8 A. I'd say that is somewhat accurate. 9 Q. Well, tell me what part you'd like to 10 add to or delete. 11 A. Two people getting hit in the face. I 12 don't -- I don't believe that was part of what 13 happened. 14 Q. Did you hit Daniel in the face? 15 A. Yes. 16 Q. Okay. And did he hit you in the face? 17 A. No. 18 Q. He never hit you in the face? 19 A. I don't -- I don't believe so. I'm not 20 positive. 21 Q. Okay. Well, tell us how that whole 22 thing got started and what happened, then. 23 A. Essentially, it was another regular day, 24 and we get off the bus, and we see one of our 25 friends who we start walking in the hallway, and I</p> <p style="text-align: right;">Page 129</p>

<p>1 well.</p> <p>2 Q. Other than the incidents that we've</p> <p>3 discussed your sophomore year, is there anything</p> <p>4 else that -- or is there anything else that sticks</p> <p>5 out in your mind regarding any disciplinary issues</p> <p>6 that you believe that were important to you that you</p> <p>7 remember that you can convey to us today?</p> <p>8 A. Just the second incident in the office.</p> <p>9 Q. That's with Mr. Archuleta?</p> <p>10 A. Yes, correct.</p> <p>11 Q. Okay. And again, I'll defer to</p> <p>12 Mr. Quinones on this, but just did both of your --</p> <p>13 of the searches of Mr. Archuleta performed on that</p> <p>14 you alleged were inappropriate because he touched</p> <p>15 you in a sexual manner, did those occur in your</p> <p>16 sophomore year?</p> <p>17 A. Correct.</p> <p>18 Q. Okay. So nothing freshman, nothing</p> <p>19 after sophomore, just those two incidents that we're</p> <p>20 complaining about sophomore year?</p> <p>21 A. That's correct.</p> <p>22 Q. Okay. Great. Just trying to narrow it</p> <p>23 down. Was it towards the beginning of the year,</p> <p>24 middle year, end of year, or were the -- incident</p> <p>25 one and incident two spread out?</p> <p style="text-align: right;">Page 150</p>	<p>1 anything like that, so I thought that was</p> <p>2 off-putting for sure.</p> <p>3 Q. Okay. You speak Spanish or no?</p> <p>4 A. No.</p> <p>5 Q. Do you know sometimes when people use</p> <p>6 the word mijito and terms of that, that it's some</p> <p>7 type of acknowledgment of actually being closeness</p> <p>8 or friends?</p> <p>9 A. I know what it means.</p> <p>10 Q. Okay. So why is that so off-putting?</p> <p>11 A. Because I know for a fact he's not</p> <p>12 somebody of Daniel's family line, so I thought that</p> <p>13 that was awkward. I've seen, you know, Daniel's</p> <p>14 uncles and stuff talk to him like that, but never</p> <p>15 anybody else that wasn't related.</p> <p>16 Q. And how would Daniel respond to that?</p> <p>17 A. In my -- the way I viewed it, he was I</p> <p>18 guess you could say really awkward, like really</p> <p>19 weirded out.</p> <p>20 Q. Did Daniel respond in English or Spanish</p> <p>21 or not at all?</p> <p>22 A. I don't think he responded.</p> <p>23 Q. About how many times did you hear</p> <p>24 Mr. Archuleta say to Daniel "mijito"?</p> <p>25 A. Every once in a while. It was maybe</p> <p style="text-align: right;">Page 152</p>
<p>1 A. I believe that it was at the end of the</p> <p>2 year, towards the end of the year.</p> <p>3 Q. Had you learned Mr. Archuleta's name</p> <p>4 prior to these searches that you claim are -- were</p> <p>5 inappropriate?</p> <p>6 A. Yes. Everyone knew him as George.</p> <p>7 Q. I'm not there obviously, but was he a</p> <p>8 friendly guy? Did he talk to a lot of the students?</p> <p>9 Did they just not like him? Was he mean to people?</p> <p>10 Can you kind of tell us from your perspective how he</p> <p>11 was viewed?</p> <p>12 A. I wouldn't -- I wouldn't say that he</p> <p>13 would be mean or anything, but people -- the people</p> <p>14 that I know that say they've had interactions with</p> <p>15 him say it's just kind of off-putting. He acts a</p> <p>16 little bit weird.</p> <p>17 Q. Okay. By a little bit weird, can you</p> <p>18 describe that?</p> <p>19 A. From my experience, just little stuff</p> <p>20 that he does, like he'll be in the hallway, like</p> <p>21 there's a few times that me and Daniel were in the</p> <p>22 hallway, and he'll be like he was talking to Daniel</p> <p>23 and he said something mijito and like it was just --</p> <p>24 it was pretty off-putting because he's not anybody</p> <p>25 of family -- family relations or blood ties or</p> <p style="text-align: right;">Page 151</p>	<p>1 like three, four times.</p> <p>2 Q. Were there other security personnel</p> <p>3 present when Mr. Archuleta said mijito to Daniel?</p> <p>4 A. No.</p> <p>5 Q. Now, at V. Sue Cleveland there's</p> <p>6 thousands of students; is that a fair statement?</p> <p>7 A. Correct.</p> <p>8 Q. When -- would there be occasion where it</p> <p>9 would just be yourself, Daniel and Mr. Archuleta</p> <p>10 without all these other students present where he</p> <p>11 would tell Daniel mijito?</p> <p>12 A. I mean, everybody's around but it's very</p> <p>13 loud, especially in the hallways when everybody's</p> <p>14 walking, and you can't -- you can barely hear</p> <p>15 anything. It was -- I was barely able to hear him</p> <p>16 talking to Daniel.</p> <p>17 Q. Did you ever hear Mr. Archuleta look at</p> <p>18 any other students, okay, and use the words mijito?</p> <p>19 A. I don't believe I did.</p> <p>20 Q. About how old, to your best estimate,</p> <p>21 was Mr. Archuleta your sophomore year when he used</p> <p>22 the term mijito with Daniel?</p> <p>23 A. My best guess would be 40s or 50s, maybe</p> <p>24 older.</p> <p>25 Q. Did he act weird in any other manner, in</p> <p style="text-align: right;">Page 153</p>

<p>1 your opinion?</p> <p>2 A. Yeah, definitely.</p> <p>3 Q. Can you explain that?</p> <p>4 A. Like sometimes I'd be in the hallway and</p> <p>5 he'll be like -- you know what I mean, I'd just be</p> <p>6 walking to class or something, and he'll be like you</p> <p>7 got anything on you or I'm going to search you later</p> <p>8 or like, you know what I mean, just trying to make</p> <p>9 me lash out or just antagonize me, something like</p> <p>10 that.</p> <p>11 Q. Did -- and what was your response?</p> <p>12 A. Honestly, most of the time I'd just</p> <p>13 ignore him.</p> <p>14 Q. Just wouldn't even answer, right? Just</p> <p>15 keep moving?</p> <p>16 A. Right. I figured that's what he wants</p> <p>17 me to do. He's looking for a reason to get me in</p> <p>18 trouble.</p> <p>19 Q. Aside from Daniel, who's also a</p> <p>20 plaintiff in these cases, is there any independent</p> <p>21 witness who you can identify for us today who saw</p> <p>22 George Archuleta antagonize you as you've just</p> <p>23 described?</p> <p>24 MR. BULLION: Form.</p> <p>25 BY MR. WALZ:</p> <p style="text-align: right;">Page 154</p>	<p>1 A. Correct.</p> <p>2 Q. Okay. All right. And so tell us to the</p> <p>3 best of your recollection what exactly occurred</p> <p>4 between you and Mr. Archuleta on these two</p> <p>5 incidents. Go with the first incident obviously</p> <p>6 first and then the second one. So go ahead, please.</p> <p>7 A. On the first incident it's -- it's</p> <p>8 essentially like every other time I'm getting</p> <p>9 searched, I'm sitting at this little kind of bench</p> <p>10 area in front of the nurse's office in front of the</p> <p>11 footage area, and that -- both of those incidents</p> <p>12 were very off-putting because usually most of those</p> <p>13 doors are open, like the nurse's door is usually</p> <p>14 wide open and she's taking care of people, and just</p> <p>15 like the footage room, that's usually wide open with</p> <p>16 the guards watching the footage, and</p> <p>17 Mr. Affentranger's door is open sometimes.</p> <p>18 And all those doors were closed, and it</p> <p>19 was just me in the hallway, and George grabbed my</p> <p>20 backpack from where I was sitting from the side, and</p> <p>21 he proceeded to unzip it and turn my backpack upside</p> <p>22 down and just pretty much started shaking everything</p> <p>23 out. And I have some heavy stuff in my backpack,</p> <p>24 you know, so everything was hitting the desk pretty</p> <p>25 hard.</p> <p style="text-align: right;">Page 156</p>
<p>1 Q. Do you understand my question?</p> <p>2 A. Yes, I do.</p> <p>3 Q. What's your answer?</p> <p>4 A. If -- if there was anybody, I would</p> <p>5 assume it would be Daniel or Laius that would have</p> <p>6 seen it.</p> <p>7 Q. Okay. All right. So now let's focus --</p> <p>8 and again I'll let Mr. Quinones do this line of</p> <p>9 questioning. I'm just trying to get an overview.</p> <p>10 On the two incidents that you state that he touched</p> <p>11 you in a sexually inappropriate manner, what</p> <p>12 activity occurred that led you to be encountered by</p> <p>13 Mr. Archuleta?</p> <p>14 A. I believe both of the times I was</p> <p>15 actually brought out of class for incidents, and</p> <p>16 that's why I was down there.</p> <p>17 Q. Excuse me. Thinking back now, can you</p> <p>18 tell me what those incidents were or is it just</p> <p>19 something you don't remember?</p> <p>20 A. I can't recall.</p> <p>21 Q. Okay. Do you remember was it the same</p> <p>22 teacher whose classroom you were taken from?</p> <p>23 A. I believe it was different classes.</p> <p>24 Q. Okay. Now, we're only talking about the</p> <p>25 two incidents for the inappropriate conduct. Okay?</p> <p style="text-align: right;">Page 155</p>	<p>1 And then he said, you know, come here</p> <p>2 for your search or whatever, and I stepped into like</p> <p>3 the door frame of where the security room is in the</p> <p>4 hallway. So I stepped into the door frame, and he</p> <p>5 proceeded to tell me to take off my shoes and take</p> <p>6 out my insole and check in my socks, and he told me</p> <p>7 to get my waistband and flip it inside out so if</p> <p>8 there was anything in there, it would fall.</p> <p>9 And then he told me to turn around, and</p> <p>10 then he put his hands in my pockets to see if there</p> <p>11 was anything there. I guess, he felt a bulge or</p> <p>12 something. He asked me if I had shorts underneath,</p> <p>13 and if I did, if I could take those off, and I had</p> <p>14 addressed him. I had told him that even if I had</p> <p>15 shorts under, I don't feel comfortable with doing</p> <p>16 that, and from that point he kind of got mad and he</p> <p>17 continued to search me.</p> <p>18 He starts doing the kind of I guess you</p> <p>19 could say cop search, the pat down your legs all the</p> <p>20 way up and down. He's checking in my cuffs in my</p> <p>21 socks to see if there's anything in there. And as</p> <p>22 I'm facing the wall, he's checking my left cuff on</p> <p>23 my left leg, and he's going up patting my leg, and</p> <p>24 he's getting really high in my thigh at this point.</p> <p>25 And, you know, this is -- this happens a</p> <p style="text-align: right;">Page 157</p>

40 (Pages 154 - 157)

<p>1 lot. So at this point I'm kind like, you know what</p> <p>2 I mean, let's get this over with, can you just check</p> <p>3 whatever I have and give me my stuff and I can go</p> <p>4 back to class. And so he's getting really high on</p> <p>5 my thigh on the left side and kind of -- I'm kind of</p> <p>6 shook. I just -- I feel something -- something</p> <p>7 touch me on my left -- my left testicle, and --</p> <p>8 Q. Okay. Go ahead.</p> <p>9 A. I back into the hallway, and I believe I</p> <p>10 said something to, and he -- he kind of stood there</p> <p>11 frozen just kind of like -- like nothing had</p> <p>12 happened, like he didn't do something, you know what</p> <p>13 I mean?</p> <p>14 Q. Yeah. Okay. And then what?</p> <p>15 A. I believe after that, I got sent to the</p> <p>16 principal's office and I got my referral, and I was</p> <p>17 sent back to class.</p> <p>18 Q. Okay. So let's talk about when this</p> <p>19 touching occurred that you just described. You</p> <p>20 indicated that he was doing a cop like pat down at</p> <p>21 that point --</p> <p>22 A. Yes.</p> <p>23 Q. -- going up your left leg. He looked in</p> <p>24 your left cuff, and then were you -- did you have</p> <p>25 your hands spread out to the side, over your head?</p> <p style="text-align: right;">Page 158</p>	<p>1 you feel something on your left testicle?</p> <p>2 A. Yes, correct.</p> <p>3 Q. Is that right? Is that over the pants</p> <p>4 or did he have your -- his hand in your pocket?</p> <p>5 A. This is over -- I guess you could say</p> <p>6 this is over my joggers, the pants I was wearing.</p> <p>7 Q. Okay. Is that the name of the pants,</p> <p>8 joggers?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. And so you did not -- and I gotta</p> <p>11 be a little graphic here. You did not feel anything</p> <p>12 regarding any touch on your penis or your right</p> <p>13 testicle?</p> <p>14 A. No.</p> <p>15 Q. Just left testicle?</p> <p>16 A. Correct.</p> <p>17 Q. And how long was that touch on the left</p> <p>18 testicle?</p> <p>19 A. I really couldn't gauge exactly how long</p> <p>20 it was, but I -- I kind of froze for a second, and I</p> <p>21 would assume during that time it would have been a</p> <p>22 few seconds.</p> <p>23 Q. Whenever the -- the search continued in</p> <p>24 progress, did he return his hand back towards your</p> <p>25 area of your crotch or groin?</p> <p style="text-align: right;">Page 160</p>
<p>1 Where were your hands and arms at that point?</p> <p>2 A. Straight down to my sides.</p> <p>3 Q. Okay. So it wasn't like an airport</p> <p>4 search where you have to put your arms, you know,</p> <p>5 parallel and spread them and all that, right?</p> <p>6 A. Yeah. My arms were to my sides, but</p> <p>7 when he was bending down to look in my sock cuff, I</p> <p>8 lifted my left arm so it wouldn't touch, you know</p> <p>9 what I mean, him or anything. And other than that,</p> <p>10 my arms were straight.</p> <p>11 Q. Was he standing in front of you?</p> <p>12 A. Yes, he was in front of me.</p> <p>13 Q. Okay. So was he bending over then when</p> <p>14 he was patting down your left leg working his way</p> <p>15 up?</p> <p>16 A. I'm not sure if he was bending over at</p> <p>17 that point. But when he was checking my left sock</p> <p>18 cuff, he was.</p> <p>19 Q. Okay. So he's working your -- his way</p> <p>20 up your leg. You know, you say you've been through</p> <p>21 that before. You just wanted him to finish and kind</p> <p>22 of get out of there, right?</p> <p>23 A. Exactly.</p> <p>24 Q. And then -- and I might be paraphrasing,</p> <p>25 but I'll give you a chance to clarify. Okay? Then</p> <p style="text-align: right;">Page 159</p>	<p>1 A. No. After that he -- I guess you could</p> <p>2 say after that he was trying to be as professional</p> <p>3 as possible.</p> <p>4 Q. Okay. Could you explain that a little</p> <p>5 bit, please?</p> <p>6 A. Before -- before the touching --</p> <p>7 Q. Right.</p> <p>8 A. -- he was -- I guess you could say he</p> <p>9 was a little sloppy with it. Like I said, he -- you</p> <p>10 know what I mean, I had a lot of heavy stuff in my</p> <p>11 bag and he's just standing over here shaking my</p> <p>12 stuff out all on the desk.</p> <p>13 Q. Okay.</p> <p>14 A. I mean, after it happened, he was kind</p> <p>15 of trying to be I guess you could say more formal</p> <p>16 and like trying to do things better after, and it</p> <p>17 didn't make sense to me. Like, that's -- at the end</p> <p>18 of the day, it don't make it all right.</p> <p>19 Q. Did -- have you ever been searched at an</p> <p>20 airport?</p> <p>21 A. No.</p> <p>22 Q. Okay. You ever seen anybody patted down</p> <p>23 at an airport?</p> <p>24 A. No.</p> <p>25 Q. You ever been searched or patted down by</p> <p style="text-align: right;">Page 161</p>

<p>1 a police officer?</p> <p>2 A. No.</p> <p>3 Q. Have you ever watched any newscast or</p> <p>4 videos where there's actual footage of somebody</p> <p>5 being patted down during a search?</p> <p>6 A. Yes, I think so on TV or something.</p> <p>7 Q. Okay. So other than what you may have</p> <p>8 seen on TV prior to this incident you've just</p> <p>9 described, did you have any real life experiences of</p> <p>10 being stopped or patted down by law enforcement?</p> <p>11 A. No, definitely not.</p> <p>12 Q. Or at an airport even?</p> <p>13 A. No.</p> <p>14 Q. Okay. Now, you said he acted or tried</p> <p>15 to act very, you know, I think you said professional</p> <p>16 or very professional after that happened. So he --</p> <p>17 he did not call you anything like mijito or anything</p> <p>18 like that at that time, did he?</p> <p>19 A. No. He didn't -- he didn't verbally</p> <p>20 express anything.</p> <p>21 Q. Did he ever call you mijito at any time?</p> <p>22 A. Me, personally?</p> <p>23 Q. Yes.</p> <p>24 A. I don't think so.</p> <p>25 Q. Did -- did you report incident number</p> <p style="text-align: right;">Page 162</p>	<p>1 disgusting. I felt -- even though like personally I</p> <p>2 had not done anything, but I felt as if something</p> <p>3 was wrong. I felt -- you know what I mean, I felt</p> <p>4 dirty.</p> <p>5 Q. Did you ever play athletics in school?</p> <p>6 A. No.</p> <p>7 Q. So you've never been in the, quote,</p> <p>8 boy's locker room after practice where everybody's</p> <p>9 showering and this and that and --</p> <p>10 A. I had PE, but never for a sport or</p> <p>11 anything.</p> <p>12 Q. Okay. All right. So how long -- time</p> <p>13 expired before the second incident?</p> <p>14 A. It had to have been a few weeks or</p> <p>15 something like that, a month.</p> <p>16 Q. So what were the facts and circumstances</p> <p>17 that occurred that had Mr. Archuleta encounter you</p> <p>18 again?</p> <p>19 A. I'm not sure what the reasons were, but</p> <p>20 I remember being in class and security coming in to</p> <p>21 get me, and I was asking for what reason, and they</p> <p>22 pretty much told me that they couldn't tell me, that</p> <p>23 I had to wait to see what was going on until I spoke</p> <p>24 to the principal.</p> <p>25 Q. Okay. Oh, I forgot to ask you one thing</p> <p style="text-align: right;">Page 164</p>
<p>1 one that you just described to your mother?</p> <p>2 A. I believe -- I believe after the second</p> <p>3 incident, I had -- I had mentioned something.</p> <p>4 Q. And I'll give you a chance to talk about</p> <p>5 the second incident in just a minute, but I'm trying</p> <p>6 to -- for the record, after the first incident that</p> <p>7 you just described, did you tell your mother</p> <p>8 anything at that time about that incident?</p> <p>9 A. I'm not quite positive if I did or if I</p> <p>10 mentioned everything after the second.</p> <p>11 Q. Okay. All right. And so you described</p> <p>12 -- was the touch a light touch? Did it hurt you?</p> <p>13 Did it require medical treatment?</p> <p>14 A. It didn't -- it didn't hurt. It didn't</p> <p>15 hurt or anything. It's just, I don't know, it's</p> <p>16 hard to describe. It was very uncomfortable. It's</p> <p>17 like -- it's like I don't think anybody would want</p> <p>18 to be touched there without consent or anything like</p> <p>19 that, so it was very foreign, very awkward, I guess</p> <p>20 you could say.</p> <p>21 Q. Okay. And I understand -- I understand</p> <p>22 what you said, but I want to also know if it caused</p> <p>23 you any physical discomfort at that time?</p> <p>24 A. I'm sure this is a mental thing, but at</p> <p>25 the time I guess you could say that I -- I felt</p> <p style="text-align: right;">Page 163</p>	<p>1 about that first incident. You said the nurse's</p> <p>2 office door was closed. But where the search that</p> <p>3 happened, wasn't that in a public hallway at school?</p> <p>4 A. The search wasn't in the hallway, but</p> <p>5 yeah, I guess you could say it's a public hallway,</p> <p>6 but there are two access keys that you have to have</p> <p>7 to get in either door.</p> <p>8 Q. Okay. Were people coming and going in</p> <p>9 that area during this time?</p> <p>10 A. That's one thing I also got really</p> <p>11 uncomfortable with. I was sitting there, and</p> <p>12 there's usually -- there's usually the campus cops</p> <p>13 or the nurse or, you know what I mean, assistants</p> <p>14 from the main office coming in and out getting</p> <p>15 paperwork and stuff, printing. And that -- those</p> <p>16 two times, all those doors were closed and no one --</p> <p>17 it was kind of like there was no one there besides</p> <p>18 us.</p> <p>19 Q. And how long did that search take?</p> <p>20 A. I'd say max like 15 minutes.</p> <p>21 Q. Do you think it was that long? That's</p> <p>22 quite a while.</p> <p>23 A. I mean, when he did the whole, you know,</p> <p>24 shake the stuff out of my bag, he kind of examined</p> <p>25 everything and he was really trying to look in every</p> <p style="text-align: right;">Page 165</p>

<p>1 pocket and every little like crevice of my backpack 2 to see if I had any contraband or anything. 3 Q. And nothing was found was it? 4 A. No. 5 Q. Okay. So now, let's go then to the 6 second search. Where location-wise at school did 7 that take place? 8 A. This was also in the security office 9 next to the nurse's and the footage room. 10 Q. Were the doors open at the nurse's 11 office the second time? 12 A. No. Also closed. 13 Q. Was it the same time of day as the first 14 search? 15 A. I don't think it was. I remember the 16 first search was more earlier in the day, and I 17 remember they -- I got my referral, and they kind of 18 just sent me back to class. And I remember I had a 19 good amount of periods after that. This time it was 20 more towards the end of the day. 21 Q. So tell me about what happened or tell 22 us about what happened in the second search. 23 A. Yes. Very similar to incident one. I 24 was in class doing normal stuff, my work or whatever 25 assignment we were doing. Security had appeared and</p> <p style="text-align: right;">Page 166</p>	<p>1 really good, and he would tell me come here, and 2 then we would start the search, but this time he 3 told me to flip my waistband. 4 He looked in my socks, and then he told 5 me to face the other direction when he was doing the 6 same type of kind of, I guess to say cop pat down of 7 your legs. And so I was now facing the hallway 8 towards those same waiting chairs like towards the 9 nurse's office, you could say. And he's doing the 10 same, you know, leg to leg pat down, and then out of 11 nowhere, I was grabbed between -- between my legs. 12 But this time it wasn't -- it wasn't just -- it 13 wasn't just my left testicle. He essentially tried 14 to grab everything. 15 Q. Was he standing behind you or was he in 16 front of you again? 17 A. He's in front of me. I'm sorry, that's 18 first scenario. Second scenario, he's behind me. 19 Q. Okay. Okay. And were there other 20 security personnel there? 21 A. They were there, but like I said, they 22 were in the footage room and that door had to be 23 closed at that time. 24 Q. Okay. So when he grabbed you, as you 25 described, did you say anything? Did you tell him</p> <p style="text-align: right;">Page 168</p>
<p>1 they wanted me to go with them, so, of course, I 2 did. I'm not trying to make a scene in class or 3 anything. 4 So I went down with them. Again, I'm 5 trying to ask them what's happening. They 6 essentially tell me again that I have to wait to 7 talk to the principal to see what's happening. And 8 I was like, fine, whatever. We get down there, and 9 the security guards that I believe there was -- 10 there was a bunch of security guards that time, and 11 all the other ones, they kind of went in the footage 12 room and then after that, they closed the door. 13 I don't know what happened to the campus 14 cops. They probably went back to the little room 15 they have or whatever, but after that, I was -- I 16 was sitting in those little chairs again in the 17 waiting room in front of the nurse's office, and it 18 was that same eery feeling to where no one's walking 19 by like usual or the footage room door isn't open 20 like usual or the nurse's door. 21 And then I was -- you know, I got -- he 22 grabbed my backpack again and he did the same 23 routine of I guess you could say dumping all my 24 stuff out of my backpack, checking all of my 25 backpack pockets and, you know, corners, crevices</p> <p style="text-align: right;">Page 167</p>	<p>1 to stop? Did you -- what did you do? 2 A. I stepped into the hallway in front of 3 me and I turned around, you know what I mean, and 4 I'm pretty sure I addressed him again, and he had a 5 really weird look on his face. It kind of just 6 like, it gave me the weirdest feeling. It was just 7 kind of like I guess you could say a smirk, if you 8 will. 9 He was just standing there again as if 10 nothing had happened, and it was just crazy to me 11 that I guess you could say something happens like 12 that and you're just unphased with emotion. 13 Q. Well, let me ask you this, do you 14 think -- based on your knowledge of human 15 interactions for yourself, do you think that 16 Mr. Archuleta was trying to approach you somehow in 17 a sexually inappropriate manner? 18 A. That -- it's definitely the vibe I got, 19 but I wouldn't like to think of it like that, but 20 it's definitely the vibe I got. 21 Q. Did you get that vibe the first time, 22 too? 23 A. Yes. 24 Q. Well, how did you view Mr. Archuleta? 25 Did you -- I'm not in your shoes. Did you see him</p> <p style="text-align: right;">Page 169</p>

<p>1 my entire friend group. Everyone that I associate 2 myself with is for a reason, so I'd say -- I'd say 3 there's a few people. 4 Q. Well, I don't know who they are. I 5 mean, are they some of the people we mentioned 6 earlier like Gabriel Garcia Marcus and Andres 7 Valencia? Are those some of your closer friends now 8 still? 9 A. Yes. 10 Q. How frequently do you keep in touch with 11 them? 12 A. About once a week. 13 Q. In person or video or how do you -- how 14 does this contact occur? 15 A. Over the phone or in person. 16 Q. Do you ever go out to eat dinner with 17 them or lunch, that type of thing? 18 A. Yeah, once in a while. 19 Q. Do you still ever go to Cottonwood Mall 20 with your friends? 21 A. It's been a real long time, but I guess 22 you could say that's something we still do. 23 Q. Have you ever been stopped by security 24 at Cottonwood Mall? 25 A. No.</p> <p style="text-align: right;">Page 178</p>	<p>1 everybody? Carlos? 2 MR. QUINONES: Yes. 3 MR. WALZ: Todd? 4 MR. BULLION: Sounds good. 5 MR. WALZ: Madam Court Reporter? 6 THE COURT REPORTER: Yes, sounds good. 7 Thank you. 8 MR. WALZ: We'll be back at 2:30. 9 THE COURT REPORTER: Okay. 10 (At this time, a recess was 11 taken.) 12 MR. WALZ: I don't have any other 13 questions of you. After Mr. Quinones or Mr. Bullion 14 or -- finish with you, I might, might not -- 15 probably not because they usually cover everything 16 or it's already been covered. If I don't get to 17 talk to you again, I do want to thank you for your 18 cooperation. 19 Sometimes this can be a little bit tense 20 at times. Sometime it's kind of even fun, so it's 21 hard to say what your experience is, but I do 22 appreciate you trying to answer the questions to the 23 best of your ability, so thank you. 24 So at this time, I'd pass the witness. 25 EXAMINATION</p> <p style="text-align: right;">Page 180</p>
<p>1 Q. Have you ever been arrested for any 2 crime? 3 A. No. 4 Q. Do you have any type of juvenile record 5 at all? 6 A. No. 7 Q. When is your next appointment with 8 Dr. Penland? 9 A. I would have to check again. 10 Q. You just can't tell me off the top of 11 your head or give me even a projected date? 12 A. No. 13 Q. All right. Well, you know, I -- like I 14 said, I take a break every hour. It's been more 15 than an hour. I'm just about done. I might be 16 finished with my questioning. 17 MR. WALZ: What I'd like to do with 18 everybody's permission, when we come back at 2:30, I 19 probably won't have any additional questions, and 20 I'll pass the witness to Mr. Quinones, and then your 21 attorney can ask questions if he wants to at an 22 appropriate time, too. 23 But that's just for everybody's timing 24 so we know where we're at. I'm either close to done 25 or done. So come back at 2:30. Is that okay with</p> <p style="text-align: right;">Page 179</p>	<p>1 BY MR. QUINONES: 2 Q. Joseph, my name is Carlos Quinones. I'm 3 the attorney representing George Archuleta in this 4 lawsuit. And is it okay if I call you Joseph? 5 A. That's fine. 6 Q. All right. And I have some things I 7 wanted to clarify from your earlier testimony. So 8 as I understand it, after -- at least by the -- 9 after the second incident with Mr. Archuleta where 10 you allege he touched you inappropriately, you told 11 your mom you had been searched more than 50 times? 12 A. Correct. 13 Q. And this 50 times, was it all by 14 Mr. Archuleta or other guards or a combination of 15 guards? 16 A. This was a combination of guards. 17 Q. And as far as all these searches you 18 told your mother about, again, your testimony is 19 there were only two times when Mr. Archuleta touched 20 you inappropriately? 21 A. Correct. 22 Q. Okay. That first one, I was a little 23 confused and maybe you can help me, but the first 24 incident when Mr. Archuleta touched you 25 inappropriately, where he searched you, was it in a</p> <p style="text-align: right;">Page 181</p>

<p>1 A. I guess contact the school or something.</p> <p>2 Q. And to your knowledge, did Mark</p> <p>3 Mondragon ever call the school about these events?</p> <p>4 A. I'm not sure.</p> <p>5 Q. And then number 5 you mentioned you</p> <p>6 spoke with Laius Martinez about inappropriate</p> <p>7 touching by George Archuleta.</p> <p>8 A. Exactly.</p> <p>9 Q. To your knowledge, did your mom, Ms.</p> <p>10 Salazar, ever report Mr. Archuleta's inappropriate</p> <p>11 conduct to any school administration officials?</p> <p>12 A. Not that of any knowledge that I have.</p> <p>13 Q. And to your knowledge, Joseph, has your</p> <p>14 mom ever contacted law enforcement, the police, to</p> <p>15 report Mr. Archuleta?</p> <p>16 A. Not to my knowledge.</p> <p>17 Q. And you're 18 years old now, right?</p> <p>18 A. Correct.</p> <p>19 Q. Have you ever reported Mr. Archuleta's</p> <p>20 misconduct to any law enforcement?</p> <p>21 A. No.</p> <p>22 Q. And why not?</p> <p>23 A. I guess you could say I was -- I was</p> <p>24 kind of afraid that it was going to be the same</p> <p>25 situation when I mentioned something to</p> <p style="text-align: right;">Page 214</p>	<p>1 number 11 of Exhibit 1. And I'll read it out loud</p> <p>2 because it's kind of short. Please identify all</p> <p>3 third-party fact witnesses that had personal</p> <p>4 observations and/or knowledge of the allegations in</p> <p>5 the plaintiff's complaint that the plaintiff may or</p> <p>6 will call at trial. Describe the nature of their</p> <p>7 proposed testimony and include contact information</p> <p>8 for each witness.</p> <p>9 Answer, and again there's some</p> <p>10 objections that not all witnesses had been</p> <p>11 identified, but you mentioned Laius and Daniel.</p> <p>12 But as I take your testimony, as far as</p> <p>13 the two occasions when Mr. Archuleta touched you</p> <p>14 inappropriately, to your knowledge only you and</p> <p>15 Mr. Archuleta were present, right?</p> <p>16 A. Correct.</p> <p>17 Q. And to your knowledge, did anyone else,</p> <p>18 any third person witness Mr. Archuleta searching you</p> <p>19 inappropriately?</p> <p>20 A. I believe not.</p> <p>21 Q. And so for those two incidences it's</p> <p>22 basically your word against Mr. Archuleta's word?</p> <p>23 A. Correct.</p> <p>24 Q. All right. You don't have any other</p> <p>25 evidence of him touching you inappropriately, your</p> <p style="text-align: right;">Page 216</p>
<p>1 Affentranger.</p> <p>2 Q. And at Cleveland High School I know it's</p> <p>3 a pretty large school, is there like a resource</p> <p>4 officer present at the school that's a member of a</p> <p>5 law enforcement agency?</p> <p>6 A. Yes, correct.</p> <p>7 Q. Do they have just one or two there</p> <p>8 normally?</p> <p>9 A. I believe there's always two.</p> <p>10 Q. Did you ever report Mr. Archuleta's</p> <p>11 inappropriate contact to any of those school</p> <p>12 resource officers?</p> <p>13 A. No.</p> <p>14 Q. And why not?</p> <p>15 A. The same thing with the other situation</p> <p>16 with Affentranger, just fear of the same thing</p> <p>17 happening, I guess you could say.</p> <p>18 Q. You thought you wouldn't be listened to?</p> <p>19 A. Essentially, yeah.</p> <p>20 Q. All right. Let's go to -- and do you</p> <p>21 know any of those school resource officers during</p> <p>22 your sophomore year? Do you recall any of them by</p> <p>23 name?</p> <p>24 A. I do not.</p> <p>25 Q. All right. Let's go to interrogatory</p> <p style="text-align: right;">Page 215</p>	<p>1 testimony?</p> <p>2 A. Yes, I do not.</p> <p>3 Q. All right. You don't have any</p> <p>4 documents, photos, pictures, anything like that that</p> <p>5 would support your contention that he touched you</p> <p>6 inappropriately?</p> <p>7 A. No.</p> <p>8 Q. Okay. Let me scroll down here to 19.</p> <p>9 All right. I don't know if you want to read it or I</p> <p>10 can just cut to the chase. Do you want to read it?</p> <p>11 Yeah, let me know when you're ready.</p> <p>12 A. All right.</p> <p>13 Q. You all set?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. And, again, here you were asked</p> <p>16 basically who saw George do these things. And you</p> <p>17 answered: George touching -- Joe does not believe</p> <p>18 any other person observed the inappropriate touch.</p> <p>19 And that's what you just told me, right?</p> <p>20 A. Correct.</p> <p>21 Q. And then regarding John Doe #1, you</p> <p>22 mentioned Daniel Mondragon was present, right?</p> <p>23 A. Correct.</p> <p>24 Q. And when you were urinating on that</p> <p>25 occasion, it was -- I know some men's restrooms</p> <p style="text-align: right;">Page 217</p>

55 (Pages 214 - 217)